IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA Richmond Division

ROBERT DAVID STEELE et al)	
Plaintiffs,)	
v.)))	Case 3:17-cv-601-MHL
JASON GOODMAN <u>et al</u>)	
Defendants.)))	

PLAINTIFFS' MOTION FOR SANCTIONS

Plaintiffs, Robert David Steele and Earth Intelligence Network ("Plaintiffs"), by counsel, pursuant to Rule 11(c) of the Federal Rules of Civil Procedure and Local Civil Rule 7, respectfully move the Court to impose monetary and non-monetary sanctions upon Defendant, Jason Goodman, for conduct that violates Fed. R. Civ. P. 11(b).

The arguments and legal bases for this Motion are stated more fully in Plaintiffs' Memorandum in Support of Motion, being filed contemporaneously with this Motion.

A proposed Order is attached hereto as *Exhibit "A"*.

DATED: June 6, 2019

Signature of Counsel On Next Page

ROBERT DAVID STEELE EARTH INTELLIGENCE NETWORK

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CERTIFICATE OF SERVICE

I hereby certify that on June 6, 2019 a copy of the foregoing was filed electronically using the Court's CM/ECF system, which will send notice of electronic filing to counsel for Defendant, Patricia A. Negron, and all interested parties receiving notices via CM/ECF. I also certify that a copy of this pleading was emailed in PDF to Defendants, Goodman and Lutzke.

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